Case: 06-12867 Doc: 438 Filed: 01/02/08 Page: 1 of 3

Jan 02 2008 01:54 PM US Bankruptcy Court Western District Of Oklahoma

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

ΙN	RE:	MOORE	MEDICAL	CENTER,
L.I	L.C.,			

Case No. 06-12867-WV Chapter 7

Debtor.

TRUSTEE'S INITIAL APPLICATION TO EMPLOY ATTORNEY ON A NON-CONTINGENT BASIS; AND AFFIDAVIT OF PROPOSED ATTORNEY

Douglas Gould, as Trustee of this Bankruptcy Estate ("Estate"), files this Application to employ Douglas N. Gould, P.L.C., as attorneys to represent the Estate, and in support thereof states as follows:

- 1. The Trustee requires the services of an attorney to represent the Estate in the following matters: collection of and sale of accounts receivable; preference analysis litigation: claims litigation: compromise of controversies and any other legal issues that may arise.
- 2. Because of the past experience of Douglas N. Gould, P.L.C., the Trustee feels that he is qualified to represent the Trustee in the matters set forth above.
- 3. Pursuant to the Declaration attached hereto, Douglas Gould, certifies that he does not hold or represent any interest adverse to that of the Trustee or the Debtor's estate, and that they are a disinterested person within the meaning of 11 U.S.C. §101(14).
- 4. The Trustee proposes that Douglas Gould, P.L.C., as attorneys for the Estate, be employed and compensated for services rendered on the basis of his normal hourly fees of \$200.00 per hour and for \$65.00 per hour for legal assistants, and such additional compensation as the Court may approve.

WHEREFORE, the Trustee requests that he be authorized to employ Douglas Gould. P.L.C., as attorneys for the Estate effective as of the date of June 4, 2007, the date of conversion

Case: 06-12867 Doc: 438 Filed: 01/02/08 Page: 2 of 3

to Chapter 7, to render services as set forth above, with compensation to be paid for as an administrative expense, and such other amounts as this Court may allow.

DOUGLAS N. GOULD, TRUSTEE

Douglas N. Gould, P.L.C. 210 Park Avenue, Suite 2050 Oklahoma City OK 73102 405.319.1717 405.416.0014 (Fax)

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing instrument was mailed, postage prepaid, this day of January, 2008, to the following:

Charles Snyder Office of the U. S. Trustee 215 Dean A. McGee Ave. Oklahoma City OK 73102

Douglas N. Gould

Case: 06-12867 Doc: 438 Filed: 01/02/08 Page: 3 of 3

AFFIDAVIT OF DOUGLAS GOULD ATTORNEY AT LAW

STATE OF OKLAHOMA)	
COUNTY OF OKLAHOMA)	SS.

I, Douglas Gould. declare:

- 1. I am an attorney duly admitted to practice before all Courts of the State of Oklahoma, as well as this Court.
- 2. To the best of my knowledge, information and belief, 1 am a disinterested party within the meaning of 11 U.S.C. §101(14).
- 3. To the best of my knowledge I have no connection with the debtor, creditors or any other party in interest, their respective attorneys and accountants other than as Trustee for the estate of Moore Medical Center.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this Aday of January 2008, in Oklahoma City. Oklahoma.

DOUGLAS N. GOULD, TRUSTEE

Douglas N. Gould, P.L.C. 210 Park Avenue, Suite 2050 Oklahoma City OK 73102

405.319.1717 405.416.0014 (Fax)

SUBSCRIBED AND SWORN to before me this day of January, 2008.

My Commission Expires: